

January 3, 2017

Denise Soria
California Regional Water Quality Control Board, Central Valley Region
1685 E Street
Fresno, CA 93706

RE: Comments on Tentative Waste Discharge Requirements for Los Gatos Tomato Products, Huron Tomato Processing Plant, Fresno County, WDID 5D102109001

Dear Ms. Soria:

Thank you for providing us the opportunity to comment on the Tentative Waste Discharge Requirements (**WDRs**) and Monitoring and Reporting Program (**MRP**) for the Los Gatos Tomato Products facility in Huron. We have reviewed the WDRs and MRP and are requesting that the following changes be considered:

WDRs

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... The processing season is from late July to early October.

The processing season is from late **June** to early October.

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According to the June 2016 addendum RWD, 1,546 new acres will be added to the LAA's for a total of 6,207 acres.

The total LAA will consist of 6,545 acres, of which, 6,207 are currently usable acres for discharge.

MRP

Land Application Area Monitoring

Daily supplemental irrigation applications.

The wastewater is only applied seasonally from late June to early October as supplemental preirrigation prior to planting crops, such as winter wheat. Hydraulic and nutrient loading from the wastewater application is low. Fresh water irrigation is the primary source of moisture for the crops and occurs for most of the year. The scarcity of water in the area and highly efficient management practices such as soil moisture sensors, irrigation scheduling, and crop monitoring ensures that over applications of fresh water do not occur. Documenting all fresh water irrigations throughout the year on

the entire land application area creates unnecessary additional paperwork and monitoring that does not provide additional benefit to protecting groundwater quality. The wastewater application monitoring and reporting requirements will be sufficient to determine that the land application area is managed within agronomic rates.

Soil Monitoring

Samples shall be collected at 6-inches, 2.5, 5, 7.5, and 10 feet below ground surface.

Soil sampling and analysis at 7.5 and 10 feet below the ground surface extends the sampling far below the root zone. Soil sampling within, and just beyond, the root zone provides an indication of whether the soil nutrients are being utilized by the crop or lost via deep percolation. Soil sampling should conclude at 6 feet. This is still deeper than the root zones of the crops grown in the land application area, which are generally less than 5 feet below the ground surface. Samples below this depth are difficult to obtain, not feasible with hand auguring, and do not provide additional beneficial information to protect groundwater quality. We suggest maintaining the current sampling protocol of 6-inches, 2, 4 and 6 feet below ground surface.

Cation Exchange Capacity

The soil Cation Exchange Capacity (**CEC**) is generally a static value that is not affected by wastewater applications. We suggest removing this sampling and analysis requirement. The CEC has been measured at each soil monitoring location and sampling depth for several years. Average values of this data for each soil type would provide sufficient estimates of CEC of the land application area. Annual measurement of this soil property does not provide any additional protection of groundwater quality.


Soil Buffer pH

As described in the 2013 Annual Monitoring Report that was submitted on January 30, 2014: *"The soil buffer pH analysis is designed to predict the need for calcium carbonate to increase soil pH in an acid soil. It does not provide a useful analysis on soils with a pH greater than 6.0."*

The soil pH of the land application area is consistently greater than 7.0, and often ranges from 7.0 to 8.3. We suggest removing the requirement to measure soil buffer pH since this is not an appropriate test for the alkaline soils of the land application area. Monitoring trends of soil pH is sufficient to ensure that the application of wastewater is not acidifying the soil. The effects of soil acidification would be the greatest in the surface soil layer, and the 0 to 0.5 foot sample will provide the best data to monitor soil pH and potential acidification. Moreover, comparing the background locations to the land application area sampling and analysis results will provide another method of determining any potential impact of wastewater application.

We appreciate the opportunity to provide input on the tentative WDRs and MRP. If you have any questions regarding our suggestions or wish to discuss them further, please contact me at (559) 636-1166.

Sincerely,



Hilary Reinhard, PE
Senior Engineer